

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SEVEN NETWORKS, LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 2:17-cv-00442-JRG

LEAD CASE

SEVEN NETWORKS, LLC,

Plaintiff,

v.

**SAMSUNG ELECTRONICS CO., LTD AND
SAMSUNG ELECTRONICS AMERICA, INC.**

Defendants.

Civil Action No. 2:17-CV-441-JRG

CONSOLIDATED CASE

**JOINT MOTION FOR LEAVE TO TAKE CERTAIN DEPOSITIONS
AFTER FACT DISCOVERY DEADLINE**

Plaintiff SEVEN Networks, LLC (“SEVEN”) and Defendants Google LLC (“Google”) and Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) respectfully move for leave for the parties to take the depositions of certain witnesses after the August 31, 2018 fact discovery deadline. The parties are working diligently to complete all of the necessary depositions of fact witnesses in this case, but have determined that it will be necessary for the depositions of certain party and third-party witnesses to be conducted after the August 31 discovery deadline due to scheduling conflicts for the witnesses and for counsel.

These depositions are as follows:

Third-party Witnesses

- Noah Kravitz (to be deposed September 7, 2018)

- Donna Maisel (to be deposed September 6, 2018)

Party Witnesses

- Ross Bott (to be deposed September 5, 2018)

This request is not for the purpose of delay and will not impact any other deadlines in the case schedule. SEVEN, Google and Samsung agree to the relief requested herein.

Dated: August 24, 2018

Respectfully submitted,

*/s/ Vishal Patel, with permission by
Michael E. Jones*

Bruce S. Sostek

State Bar No. 18855700
Bruce.Sostek@tklaw.com

Max Ciccarelli

State Bar No. 00787242
Max.Ciccarelli@tklaw.com

Herbert J. Hammond

State Bar No. 08858500
Herbert.Hammond@tklaw.com

Richard L. Wynne Jr.

State Bar No. 24003214
Richard.Wynne@tklaw.com

Adrienne E. Dominguez

State Bar No. 00793630
Adrienne.Dominguez@tklaw.com

Vishal Patel

State Bar No. 24065885
Vishal.Patel@tklaw.com

Nadia E. Haghighatian

State Bar No. 24087652
Nadia.Haghighatian@tklaw.com

Austin Teng

State Bar No. 24093247
Austin.Teng@tklaw.com

Matthew Cornelia

State Bar No. 24097534

Samuel F. Baxter

Texas State Bar No. 01938000
sbaxter@mckoolsmith.com

McKool Smith, P.C.

104 E. Houston Street, Suite 300
Marshall, Texas 75670
Telephone: (903) 923-9000
Facsimile: (903) 923-9099

Theodore Stevenson, III

Texas State Bar No. 19196650
tstevenson@mckoolsmith.com

Eric S. Hansen

Texas State Bar No. 24062763
ehansen@mckoolsmith.com

McKool Smith, P.C.

300 Crescent Court, Suite 1500
Dallas, Texas 75201
Telephone: (214) 978-4000
Telecopier: (214) 978-4044

**ATTORNEYS FOR PLAINTIFF
SEVEN NETWORKS, LLC.**

Matt.Cornelia@tklaw.com
THOMPSON & KNIGHT LLP
One Arts Plaza
1722 Routh St., Suite 1500
Dallas, Texas 75201
214.969.1700
214.969.1751 (Fax)

**ATTORNEYS FOR PLAINTIFF
SEVEN NETWORKS, LLC.**

Dated: August 24, 2018

Respectfully submitted,

/s/ Charles K. Verhoeven, with permission by
Michael E. Jones

Charles K. Verhoeven
charlesverhoeven@quinnemanuel.com
Sean S. Pak
seanpak@quinnemanuel.com
Brian E. Mack
brianmack@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111
Tel: 415-875-6600
Fax: 415-875-6700

Patrick D. Curran
patrickcurran@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010
Tel: 212-849-7000
Fax: 212-849-7100

Michael E. Jones
State Bar No. 10929400
mikejones@potterminton.com
POTTER MINTON LLP
110 N. College Avenue, Suite 500
Tyler, TX 75702
Telephone: (903) 597-8311
Facsimile: (903) 593-0846

Attorneys for Google LLC

By: */s/ Noah C. Graubart, with permission by
Michael E. Jones*

Ruffin B. Cordell
TX Bar No. 04820550

cordell@fr.com

Michael J. McKeon
D.C. Bar No. 459780

mckeon@fr.com

Indranil Mukerji
D.C. Bar No. 974398

mukerji@fr.com

Stephen A. Marshall
D.C. Bar No. 1012870

smarshall@fr.com

W. Peter Guarnieri
D.C. Bar No. 1010950

guarnieri@fr.com

FISH & RICHARDSON P.C.
1000 Maine Ave SW, Suite 1000
Washington, DC 20024
Telephone: (202) 783-5070
Facsimile: (202) 783-2331

Leonard E. Davis
TX Bar No. 05521600
ldavis@fr.com
FISH & RICHARDSON P.C.
1717 Main Street, Suite 5000
Dallas, TX 75201
Telephone: (214) 747-5070
Facsimile: (214) 747-2091

Noah C. Graubart
Georgia Bar No. 141862
graubart@fr.com
FISH & RICHARDSON P.C.
1180 Peachtree St. NE, Fl. 21
Atlanta, GA 30309
Telephone: (404) 892-5005
Facsimile: (404) 892-5002

**COUNSEL FOR SAMSUNG ELECTRONICS
AMERICA, INC. AND SAMSUNG ELECTRONICS
Co., LTD.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on August 24, 2018.

/s/ Michael E. Jones

Michael E. Jones